

**FILED**

OCT 28 2019

UNITED STATES BANKRUPTCY COURT  
SAN FRANCISCO, CA

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a minor by and through his guardian ad litem ROBERT RUCKMAN;  
ROBERT RUCKMAN; AMALIA LEAL; and GILARDO LEAL

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:  
  
PG&E CORPORATION,  
  
and  
  
PACIFIC GAS & ELECTRIC COMPANY,  
  
Debtors.

Case No. 19-30088-DM  
Chapter 11  
RS No. LKW-001

Date: November 19, 2019  
Time: 10:00 a.m.  
Place: 450 Golden Gate Avenue, 16<sup>th</sup> Floor  
San Francisco, CA  
Judge: Honorable Dennis Montali

☐ Affects PG&E Corporation  
☐ Affects Pacific Gas & Electric Company  
☒ Affects both Debtors

\*All papers shall be filed in the Lead Case  
No. 19-30088 (DM)

Objection Deadline: November 14, 2019  
Time: 4:00 p.m. (Pacific Time)

**NOTICE OF HEARING ON MOTION TO ABSTAIN AND FOR RELIEF FROM  
AUTOMATIC STAY TO PERMIT LAWSUIT TO  
PROCEED TO TRIAL AND CONCLUSION**

TO DEBTORS, THE UNITED STATES TRUSTEE, AND OTHER INTERESTED PARTIES:

PLEASE TAKE NOTICE that a hearing on the Motion to Abstain and for Relief from  
Automatic Stay to Permit Lawsuit to Proceed to Trial and Conclusion ("the Motion") filed by  
Gloria Ruckman; Robert Ruckman; a minor by and through his guardian ad litem Robert  
Ruckman; Robert Ruckman; Amalia Leal; and Gilardo Leal ("Plaintiffs") will be heard by the

1 Honorable Dennis Montali on November 13, 2019 at 9:30 a.m. in the United States Bankruptcy  
2 Court for the Northern District of California located at 450 Golden Gate Avenue, 16<sup>th</sup> Floor, San  
3 Francisco, California in Courtroom 17. Plaintiffs are requesting through the Motion that the  
4 Bankruptcy Court (a) abstain from adjudicating Plaintiffs' claims against Pacific Gas & Electric  
5 Company ("Debtor") and other defendants named in Kern County Superior Court Case No.  
6 BCV-15-101699-DSD ("the Lawsuit") and (b) modify the automatic stay so that the Lawsuit  
7 can be tried and concluded without any restrictions caused by Debtor filing for relief under the  
8 Bankruptcy Code. Plaintiffs' claims against Debtor and the other defendants named in the  
9 Lawsuit are for personal injuries that arise from an incident or incidents that occurred in Kern  
10 County, California on or about November 13, 2016. Plaintiffs' claims are based on claims of  
11 General Negligence, Premises Liability, and Strict Liability.

12 The Motion is brought per 28 USC Section 1334(c)(1) and 11 USC Section 362(d)(1) for  
13 cause. The Motion is based on this Notice, the Motion, the Declarations of Daniel Rodriguez  
14 and Leonard K. Welsh filed in support of the Motion and upon all other pleadings and papers on  
15 file herein and such oral and documentary evidence as may be presented at the hearing on the  
16 Motion.

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18 PLEASE TAKE FURTHER NOTICE that the Debtor is advised to appear personally or  
19 by counsel at the preliminary hearing as provided in Local Rule 4001-1(a) and that failure to so  
20 appear may result in the Court granting the relief requested without further hearing, including  
21 the lifting of the automatic stay to allow Plaintiffs to pursue completion of litigation, pretrial  
22 proceedings, trial, post-trial motions and any appellate proceedings in or in connection with the  
23 Lawsuit. Respondent(s) may but will not be required to file responsive pleadings, points and  
24 authorities, and declarations in response to the Motion as provided in Bankruptcy Local Rule for  
25 the Northern District of California 4001-1(f)  
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1 PLEASE TAKE FURTHER NOTICE that any opposition or response to the Motion  
2 must be in writing, filed with the Bankruptcy Court, and served on the counsel for Plaintiffs at  
3 the above-referenced address so as to be received by **no later than 4:00 p.m. (Pacific Time) on**  
4 **November 14, 2019.** Any opposition or response must be filed and served on all "Standard  
5 Parties" as defined in the Amended Order Implementing Certain Notice and Case Management  
6 Procedures entered by the Court on March 27, 2019 ("Case Management Order"). **Any relief**  
7 **requested in the Motion may be granted without a hearing if no opposition is filed a served**  
8 **in accordance with the Case Management Order.** In deciding the Motion, the Court may  
9 consider any other document filed in these Chapter 11 Cases and related Adversary  
10 Proceedings.

11 PLEASE TAKE FURTHER NOTICE that copies of the Motion and its supporting  
12 papers can be viewed and/or obtained: (i) by accessing the Court's website at  
13 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450  
14 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtor's notice and claims  
15 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-  
16 4217 for U.S.-based parties; or +1 (929) 333-8977 for International parties or by email at:  
17 [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents on the  
18 Bankruptcy Court's website.  
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20 Date: October 23, 2019

LAW OFFICES OF LEONARD K. WELSH



21 By: /s/ Leonard K. Welsh

22 LEONARD K. WELSH  
23 Attorneys for Plaintiffs  
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